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TECHNICAL STATUS REPORT

CH2MHILL

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DATE: September 10, 1996

SUBJECT: Rhône-Poulenc Monthly Status Report

SITE NAME AND LOCATION: Rhône-Poulenc Inc./Seattle Plant
Tukwila, WA

REPORTING PERIOD: August 1 through August 31, 1996

PROJECT: 106063.P1

Following is CH2M HILL's technical status report summary for the RCRA Corrective Action Project at Rhône-Poulenc's (RP) Seattle Plant. This status report summarizes activities implemented and planned for this Corrective Action project and is intended to be transmitted to U.S. EPA Region 10 in fulfillment of the monthly progress reports required in Consent Order No. 1091-11-20-3008(h).

Progress Made This Reporting Period

Task P1-Project Management

The EPA status report was faxed to EPA on August 9 and mailed to the distribution on the same day.

Task A3-Interim Measures

Report.

A report documenting the compressor pad excavation, the PCB ditch excavation, sewer cleaning, and disposal of associated waste streams is currently being developed by Terra Nova Environmental Sciences and CH2M HILL.

LNAPL.

RP monitored the wells for LNAPL on August 31. The wells monitored for LNAPL were: H10, MW-12, H11, DM-7, H9, G3, B6, MW-14, MW-15, MW-17, MW-18, MW-19, and MW-20. No well monitored contained a measurable amount of LNAPL. The samples from wells H10 and H11 had a slight sheen. The sample from well MW-12 had

a film. The remaining wells surveyed did not contain LNAPL. Information on the LNAPL thicknesses is attached.

Task A8-Round 3 Technical Memorandum

The sections detailing the July 1 intertidal sediment sampling activity are being prepared. Once these sections are approved by EPA, these sections will be incorporated into the Round 3 Technical Memorandum along with other changes addressing EPA and Ecology comments.

Task S1-Miscellaneous Support

API Separator Clean Out.

During the first half of August, the water in the API separator was removed in three portions. Each portion was transferred to the mobile holding tank, filtered through one-micron filters, analyzed for copper by Sound Analytical, and discharged to Metro. Five hundred gallons (0.092 mg/l copper) were discharged on August 14, 500 gallons (0.048 mg/l copper) on August 16, and 500 gallons (0.041 mg/l copper) on August 18.

During the week of August 19, CEcon solidified the sludge while it was still in place in the separator. The sludge was mixed with fly ash using a Bobcat loader equipped with a backhoe. The solidified sludge was placed in a roll-off box and picked up by Diablo Transportation on August 23 for shipment to Waste Management's hazardous waste landfill in Arlington, OR. The manifest and profile numbers were 00016 and BP2464, respectively. The weight of this load was 31,300 pounds; this roll-off box contained sludge from cleaning the API separator, sediments from the storm water tank, sludge from cleaning the PCB-contaminated wash water tanks, and sludge from cleaning the non-PCB contaminated wash water tanks (see below). Samples previously submitted to Peiser Laboratories indicate that the API separator sludge contained 1290 and 2150 mg/kg copper and less than 5 mg/kg PCB. During solidification of the sludge, approximately 100 gallons of water was encountered at the bottom of the separator. This water was pumped into a vacuum truck, which already contained approximately 400 gallons of wash water from cleaning the storm water tank on August 20. The water in the vacuum truck was transferred to ten drums. Approximately fifty gallons of water used for decontamination of equipment was also transferred to one drum.

The walls of empty separator were scraped and wire-brushed to remove adhering residue. The fiberglass and wood vessel was then sawed into pieces and placed in a roll-off box. On August 27, the waste was taken by Waste Management to their Seattle transfer station, prior to disposal at their Subtitle D, Columbia Ridge Landfill at Arlington, OR. The weight of this load was 6,480 pounds.

August 1996 Status Report
Rhône-Poulenc Inc
Seattle Plant

Storm Water.

On August 19 and 20, CEcon removed the sediment from the open-top, 800,000-gallon storm water storage tank, solidified it with fly ash, and placed it in a roll-off box, along with the API separator sludge (see above). This solidified material was picked up by Diablo Transportation on August 23 for shipment to Waste Management's hazardous waste landfill in Arlington, OR. The manifest and profile numbers were 00016 and BP2464, respectively. The tank walls were pressure washed from top to bottom, and the 400 gallons of wash water was removed using a vacuum truck. The water in the vacuum truck, after adding water from the API separator cleaning, was placed in drums.

PCB-contaminated Sludge Disposal.

Two hundred fifty gallons of water from the tops of the drums of sludge from cleaning the PCB-contaminated wash water tanks and water from rinsing these drums was transferred to the mobile holding tank. This water was filtered through one-micron filters, analyzed for copper and PCB by Sound Analytical, and discharged to Metro on August 12. The analytical data were: 4.4 mg/l copper and 88 µg/l Arochlor 1254.

After the water layers were removed, the 10 full drums and 2 partial drums of sludge from cleaning the PCB-contaminated wash water tanks were consolidated into 5 drums. On August 20, CEcon solidified this sludge by mixing it with fly ash. The mixture also was placed in the roll-off box mentioned above and shipped to Waste Management's hazardous waste landfill in Arlington, OR, on August 23. The manifest and profile numbers were 00016 and BP2464, respectively. Testing in March 1996 by Peiser Laboratories indicated that this sludge contained 5 mg/kg PCBs.

Non-PCB-contaminated Sludge Disposal.

The 5 drums of non-PCB-contaminated sludge were solidified by CEcon on August 22 by mixing it with fly ash, placed in the roll-off box mentioned above, and shipped to Waste Management's hazardous waste landfill in Arlington, OR, on August 23. The manifest and profile numbers were 00016 and BP2464, respectively.

Activated Carbon Filters Disposal.

Disposal of these drums will be arranged after all accumulated water on the site has been approved for discharge to Metro.

One-micron Filter Disposal.

Two drums of used, one-micron filters were disposed of along with the API separator sludge and shipped to Waste Management's hazardous waste landfill in Arlington, OR, on August 23. The manifest and profile numbers were 00016 and BP2464, respectively.

These filters were used in filtering various waste waters before discharging them to the Metro sewer.

Task S4-Intertidal Sediment Sampling

Validated sediment data were received during the week of August 19; data indicate that the intertidal sediments do not exceed the cleanup screening levels/minimum cleanup levels of the Sediment Management Standards (WAC 173-204). These sections of the Round 3 Technical Memorandum are being prepared.

Deliverables Submitted

The July Progress Report was submitted to U.S. EPA on August 9.

Progress Planned For Next Reporting Period

Task A2-Applicable Regulations and Permits

Leasing Arrangements.

The PCB ditch area will be paved by Lakeridge Paving once excavation of contaminated soils is complete and EPA approves the Interim Measures report.

The soil and shrubbery Northwest Container Services' contractor removed from the area near the Facility's North Road, near the entrance (in RFI investigation Areas BG and A3) and from south of the laboratory building (in Area A3) is still being stockpiled on site. The soil was placed in two dirt piles (approximately 10 cubic yards) located at the northwest corner of the laboratory building and a third pile located southwest of the laboratory building (approximately 100 cubic yards). Northwest Container will dispose of this soil as non-hazardous based on past sampling data.

Task A3-Interim Measures

LNAPL.

Continue to monitor LNAPL thicknesses in selected monitoring wells monthly.

Task S1-Miscellaneous Field Support

Drum Disposal.

A total of 13 drums of wastes are on site. The wastes include:

- 11 drums of wash water from cleaning the API separator and the storm water tank, and

- 2 drums of used activated carbon

The water in the drums from cleaning the storm water tank and from cleaning out the API separator will be transferred to the mobile holding tank and filtered through one-micron filters. The filtrate will be analyzed for copper and PCBs by Sound Analytical and discharged to Metro.

Outfall 4 Wash Water in Aluminum Tank.

Approximately 1,000 gallons of outfall 4 wash water and sludge are in the aluminum tank. The water in the aluminum tank will be filtered on site through one-micron filters and discharged to Metro, provided it meets Metro's discharge parameters. Filtration of the water is expected to occur during October. Sludge in the tank will be removed, solidified, and landfilled at the Waste Management, Inc., hazardous waste facility in Arlington, OR.

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